

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

TYRONE P. JAMES :
Plaintiff,
v. :
CIVIL ACTION NO. 1:01-CV-1015
YORK COUNTY POLICE DEPARTMENT, :
JAMES H. MORGAN, RICHARD PEDDICORD, :
(Judge Kane)
RAYMOND E. CRUAL, GENE FELLS, :
(Magistrate Judge Mannion)
DET. KESSLER, CO. BAYLARK, :
RANDY SIPES, BRIAN WESTMORELAND, :
JURY TRIAL DEMANDED
and DETECTIVE GLOWCZESKI :
Defendants, :
:

FILED
PAUL WOODING, PA

LETTERS AND ATTACHMENTS [EXHIBITS].

JUL
MARY L. WOODING, CLERK
Per _____ Deputy Clerk
[Handwritten signature]

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

TYRONE P. JAMES	:	
Plaintiff,	:	
v.	:	CIVIL ACTION NO. 1:01-CV-1015
YORK COUNTY POLICE DEPARTMENT, JAMES H. MORGAN, RICHARD PEDDICORD, RAYMOND E. CRUZ, GENE VELLE, DEP. KESSLER, CO. BAYLARK, RANDY GIPPS, BRIAN WESTMORELAND, and DETECTIVE GLOWCZEWSKI	:	(Judge Kane) (Magistrate Judge Manning)
Defendants,	:	JURY TRIAL DEMANDED

PLAINTIFF'S REQUEST FOR ADMISSION OF DEFENDANTS PEDDICORD,

Pursuant to Rule 36, Fed.R.Civ.P., Plaintiff request the defendant, Richards Peddicord to make the following admissions within 30 days after the service of this request.

1. You a member of the York County Police Department?

Answer:

2. You a member of the surveillance teams that arrested Plaintiff's, in the Kingston Square Center, 2535 Eastern Blvd, York, Pa 17402, at 10:30 a.m.?

Answer:

3. You obtained an arrest warrant and search warrant, to arrest plaintiff's at the Kingston Square Center on January 10, 2001, at 10:30 a.m.?

Answer:

4. You tackle plaintiff's to the ground, in the Kingston Square Center, in front of Mail Box Etc.,

Answer:

5. You a party of the vehicle, driven by Defendant Glowczewski, on January 10, 2001, at 10:30 a.m., in the Kingston Square Center?

Answer

6. Escort Plaintiff back to the York County Police Department, in vehicle

Answer:

7. Obtained arrest and search warrant for Plaintiff's arrest on January 10, 2001?

Answer:

8. Date and time, arrest and search warrants were obtained by you?

Answer:

9. Confiscate Plaintiff's wallets in the Kingston Square Center, at the time of his arrest, he was handcuffed and on the ground, in the Kingston Square Center, on January 10, 2001, at 10:15 a.m.?

Answer:

10. United Parcel Service Driver deliver the "Mail Shift Package," to Mail Box Etc., 2636 Eastern Blvd., York, Pa 17402, on January 9, and 10, 2001?

Answer:

11. You search Plaintiff's person and property on January 10, 2001?

Answer:

12. Confiscated Plaintiff's Lawyer Network Cam?

Answer:

13. Give Plaintiff's a Inventory receipts of all items, confiscated, or taken from plaintiff's wallets?

Answer:

14. Photo Copied all items taken from plaintiff's property, while at the York County Police Department?

Answer:

15. Preliminary Arraignment plaintiff's on January 12, 2001?

Answer:

16. Present position with the York County Police Department; Drugs Task Force?

Answer:

17. Ever discriminate against member of the black race, or any other

minority groups, in your line of work, during your employment with these agencies?

Answer:

18. You requested a cash only bond for plaintiff's, in the total amount of 2.5 million dollars, from the District Justices, York County?

Answer:

19. Ever been charge or convicted of a crime, or charge with perjury?

Answer:

20. Any previous or present lawsuit pending against you in any Federal or State Courts, Bankruptcy court?

Answer:

21. Any judgment or settlement ever ruled against you?

Answer:

22. Ever been a racist cop, during your service has a public servant?

Answer:

23. You participate in the interdiction of drugs, from package mail from California, to the U.P.S. Main Office York Pennsylvania, on January 3,9 and 10, 2001, to "Make Shift Package," delivered to the Mail Box #62., 2535 Eastern Blvd., York Pa 17402, on January 10, 2001?

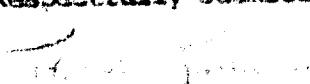
Answer:

24. Any special training before becoming a Police officer and how far did you go to school?

Answer:

Respectfully Submitted,

Date: April 13, 2004.


Tyrone P. James, Pro Se.

Ex 9451
P.O. Box A
Bellfonte, PA 16023-0020.

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

TYRONE P. JAMES	:	
Plaintiff,	:	
v.	:	CIVIL ACTION NO. 1:01-cv-1015
YORK COUNTY POLICE DEPARTMENT,	:	(Judge Kane)
JAMES H. MORGAN, RICHARD PRODICORDO,	:	(Magistrate Judge Mannion)
RAYMOND C. TUSAL, GENE FELLS,	:	
DET. KESSLER, CO. BAILARK,	:	JURY TRIAL DEMANDED
RANDY STIPES, BRIAN WESTMORELAND,	:	
and DETECTIVE GLOWICKSKI	:	
Defendants,	:	

REQUEST FOR ADMISSIONS TO DEFENDANT KESSLER

Pursuant to Rule 36, Fed.R.Civ.P., Plaintiff's request the defendant, Robert Kessler to make the following admissions within 30 days after the service of this request.

1. Mr. Kessler, you created the "make shift package" on January 9, 2001, at the main United Parcel Service, in York County, which was placed at plaintiff's mail box, 2636 Eastern Blvd., York, Pa 17402?

Answer:

1. You hand wrote the addresses and returned address, to this "make shift package," that was placed at the Mail Box Sta., 2636 Eastern Blvd., York, Pa 17402?

Answer:

3. Defendant Morgan, gave you this address, to be placed on the make shift package?

Answer:

4. You prepared a arrest and search warrant, for the plaintiff's and the mail box, at 2636 Eastern Blvd., York, PA 17402, Mail Box Sta., on January 9 and 10, 2001, at 10:30 a.m.?

Answer:

5. You hand deliver or gave the make shift package to the United Parcel

Service, driver, to be delivered at Mail Box Etc., York, Pa 17402, on January 9 and 10, 2001?

Answer:

6. Defendant Peckford a party of the vehicle which you were traveling in before the arrest of plaintiff's on January 10, 2001, around 10:30 a.m.?

Answer:

7. You obtained only one search warrant in this case, and this was obtained from District Justice Kessler, on January 10, 2001, at 7:18 p.m.?

Answer:

8. Was Mr. James arrested at the Mail Box Etc., Kingston Square Center on January 10, 2001, around 10:35 a.m.?

Answer:

9. You prepare and arrest warrant and search warrant on January 10, 2001, at 10:35 a.m., to place "Make Shift Package," at plaintiff's mail box to arrest plaintiff?

Answer:

10. Mr. Kessler, are you the Brother of District Justice, Kessler, 301 N. Main St., York, New Salem, Pa 17371?

Answer:

11. You prepare Affidavit Of Probable Cause, to support Warrant Control Number: 3695-A7

Answer:

12. You conducted and Interdiction at the United Parcel Service, York, County?

Answer:

13. You were aware that there was no contraband, meaning drugs in the state of Pennsylvania, at time Plaintiff's was arrest?

Answer:

14. You are familiar with Title 18 U.S.C. 313(a), Entrapment?

Answers:

15. You had Probable Cause to arrest plaintiff's on January 10, 2001, in the Kingstown Square Center, 1111 York St., 1600 Eastern Blvd., York Pa 17402?

Answers:

16. You Supervise the York County Drug Task Force?

Answers:

17. You discriminate against minority people, such as black, Asian or Spanish race, or other race or creed, because of the color of their skin, race, origin or nationality?

18. You the party of any lawsuit in any State or Federal Court?

Answers:

19. You ever been convicted or charged with a crime, or perjury in any court?

Answers:

20. Still the Supervisor of the York County Drug Task Force?

Answers:

Respectfully Submitted,
Tyrone James.

Tyrone P. James, Pro se.

EX 3451
P.O. Box A
Bellefonte, PA 16823-3322.

Date: April 20, 2004.

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

TYSON R. FRANKE

Plaintiff,

vs.
Brentwood Fire Department, Inc.,
Brentwood Fire Department, Inc., Plaintiff,
and Brentwood Fire Department, Inc., Plaintiff,
and Executive Firefighter
and Plaintiff.

Case No. C 01-1442-JHE

(Courtroom 10, 1st Floor, Annex)
(Plaintiff's Trial Attorney)

ATTORNEY DEFENSE

and Plaintiff

Plaintiff's Counsel, Esq.

I, Robert J. Flanagan, Plaintiff's Counsel, hereby certify that I have read and verified the foregoing complaint and the exhibits thereto, and that the same is true and correct to the best of my knowledge and belief. I am not a party to the action and do not represent Plaintiff or Plaintiff's Counsel. I am a member of the California State Bar and am admitted to practice law in the State of California and the Northern District of California.

ROBERT J. FLANAGAN, Esq.

Robert J. Flanagan
Office of the Attorney General
1111 Franklin Street
Sacramento, CA 95114

Robert J. Flanagan
Attala Street, San Leandro
94578-1700

Carrie F. Joyce
1301 K Street, Suite 1100
San Diego, CA 92101

I, certify under oath or perjury, that the foregoing is true and correct to the best of my knowledge and belief, and is sworn to before me this 20th day of April, 2004.

ROBERT J. FLANAGAN

Robert J. Flanagan - Trial Attorney
CA 01451
P.O. Box 900
Bellintone, CA 95823-0900

Dated April 20, 2004

Tyrone P. James
EX 9451
P.O. Box A
Bellefonte, PA 16823-0820

June 15, 2004

Jason C. Giurintano
Office Of Attorney General
Commonwealth Of Pennsylvania
15th Floor, Strawberry Square
Harrisburg, PA 17120

RE: Civil No. 1:CV-01-1015; Defendant Peddicord Response to Plaintiff's Request For Admissions.

Dear Attorney Giurintano:

I am in receipt of Defendant Peddicord response to plaintiff's Request For Admissions; which is untimely. Therefore, all his objections should be deemed waived, for failing to respond within the appropriate time frame pursuant to the Discovery Rule 26.

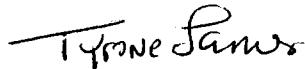
Defendant objections to request numbers 1,4,8,16,20,21, and 24, are all improper and not sufficiently specific; please note all requests are relevant to the law as it relates to the application of law to facts of the case.

Defendant Peddicord denial to requests numbers : 3,5,6,7,9,10,12,13,14,17,18,19,22, and 23, are all insufficient, without specifics, the denial is general, in statements.

Defendant Peddicord, response to request numbers: 10, and 15, of Plaintiff's request for admission would deem an refusal to admit; plus his response his misleading; insufficient as to the application of laws, as it relates to the facts of this civil case.

Plaintiff's hereby request that Defendant Peddicord response appropriately to his request for admission, within 30 days, from receipt of this letter; make his answer more specific and to the request.

Respectfully Submitted,



Tyrone P. James.

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

TYRONE P. JAMES :
Plaintiff, :
v. : CIVIL ACTION NO. 1:01-CV-1015
YORK COUNTY POLICE DEPARTMENT, : (Judge Kane)
JAMES H. MORGAN, RICHARD PEDDICORD, : (Magistrate Judge Mannion)
RAYMOND E. CRUAI, GENE FELLS, : JURY TRIAL DEMANDED
DET. KESSLER, CO. BAYLARK, :
RANDY SIPES, BRIAN WESTMORELAND, :
and DETECTIVE GLOWCZEWSKI :
Defendants, :

CERTIFICATE OF SERVICE

I, Tyrone P. James, Plaintiff's, pro se, hereby certify that, I am this day serving a true and correct copy to assigned counsel's, "letter in response, to Defendant Peddicord, answer to Plaintiff's Request For Admissions," in the manner set forth below to the following, by placing said legal manila envelope, deposited into the institutional mail box, and turning over said documents to prison officials for mailing:

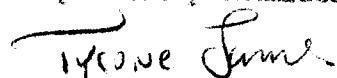
BY FIRST CLASS U.S. MAIL:

Jason C. Giurintano
Office Of Attorney General
Commonwealth Of Pennsylvania
15th Floor, Strawberry Square
Harrisburg, PA 17120

Donald L. Reihart, Esq.
Law Office Of Donald L. Reihart
3015 Eastern Blvd., Suite 204
York, PA 17402

Date: June 15, 2004.

Respectfully Submitted,


Tyrone James

Tyrone P. James
#X 0451
P.O. Box A
Bellefonte, PA 16823-0920.

Tyrone P. James
EX 9451
P.O. Box A
Dallleton, PA 16523-0820

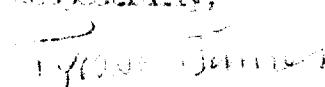
May 28, 2004

Jason C. Guirintano
Attorney General Office
Commonwealth Of Pennsylvania
16th Floor, Strawberry Square
Harrisburg, PA 17101

RE: James v. York County Police Dept., et al.

Dear Attorney Guirintano,

Plaintiff's Request For Admission to Defendant Paddicord, has not been answered. The Defendant Paddicord, has failed to response in a timely manner; 30 days after Defendants has been served. Where Plaintiff's, deem that Defendant has admitted, to all Plaintiff's Request For Admission. Also, Defendants have failed to response to Plaintiff's Second Request For Interrogatories, which the Defendants refused to respond. The Magistrate Judge ordered interrogatories on May 4, 2004.

Respectfully,


Tyrone P. James
EX 9451.

Tyrone P. James
EX 9451
P.O. Box A
Bellefonte, PA 16823-0820

May 28, 2004

Jason C. Guirintano
Attorney General Office
Commonwealth Of Pennsylvania
15th Floor, Strawberry Square
Harrisburg, PA 17120

RE: James v. York County Police Dept., et al.,

Dear Attorney Guirintano,

Defendant Anthony (Tony) Glowczeski, response to "Plaintiff's Request For Admission."

1. Defendant Glowczeski Objection to Admission NO. 2 is not sufficiently specific and is improper. The requested admission is relevant.
2. Defendant Glowczeski denial to Admission NO. 3, is not sufficiently specific, and doesn't addresses the substance of the requested admission.
3. Defendant Glowczeski denial to Admission NO.4 is not sufficiently specific; the requested admission is relevant.
4. Defendant Glowczeski objection to Admission NO.5 is improper and not sufficiently specific. The requested admission is relevant.
5. Defendant Glowczeski objection to Admission NO. 10 is improper and not sufficiently specific; this request is ground for admission, because it addresses the substance of the requested admission.
6. Defendant Glowczeski, response to Admission NO.11, is not sufficiently specific; the response is a refusal to Admit; I don't recall, is not sufficient.
7. Defendant Glowczeski, denial to Admission NO.12, is not sufficiently specific. The request is relevant.
8. Defendant Glowczeski, denial to Admission NO.13, is not sufficiently specific and does not specifically address the substance of the requested Admission. The request is relevant.
9. Defendant Glowczeski, denial of Admission NO.15, is not sufficiently specific. The request is relevant.
10. Defendant Glowczeski response to Admission NO.16, is incomplete and evasive. The requested information is relevant to this civil matter.
11. Defendant Glowczeski response to Admission NO.17 is incomplete. Defendant response is relevant, because defendant touch on this issue in his answer to plaintiff's request for interrogatories.

12. Defendant Glowczeski denial to Admission NO.13, is without specific; the denial does not specifically address the substance of the requested admission. The requested admission is relevant.

13. Defendant Glowczeski, objection to Admission NO.19, is improper and not sufficiently specific; the requested admission is relevant.

14. Defendant denial to Admission NO.20, is not sufficiently specific; the requested Admission is very relevant to the case at hand.

15. Defendant Glowczeski, objection to Admission NO.22, is improper; the requested Admission is very relevant to the substance of this case.

16. Defendant denial to Admission NO.23, is no sufficiently specific. The requested Admission is very relevant to the substance of this case.

Plaintiff's request that Defendant Glowczeski, response to this letter with the appropriate responses within 30 days. Response should be in verified form, signed by the Defendant.

Respectfully,


Tyrone P. James
EX 9451.

Tyrone P. James
EX 9451
P.O. Box A
Bellefonte, PA 16823-0820

May 28, 2004

John J. Giulintano
Office of Attorney General
Commonwealth Of Pennsylvania
16th Floor, Strawberry Square
Harrisburg, PA 17120

Mr. James v. York County Police Dept., et al., 01:01-cv-1015

Dear John J. Giulintano:

Defendant Kessler's response to Plaintiff's Request For Admission.

1. Defendant Kessler's response to Admission No.1, is improper; Defendant refused to admit to the requested admission. The request is relevant to this civil matter. His statement is general and not sufficient.

2. Defendant Kessler's response to Admission No.2 is improper and response is insufficient, it is an immediate answer.

3. Defendant Kessler's response to Admission No.3, is not sufficiently specific. It failed to address the substance of the requested Admission.

4. Defendant Kessler's to Admission No.4, is insufficient as to the substance of this case, and not specific.

5. Defendant Kessler's response to Admission No.5 is improper, the request is relevant to this civil matter; the response is insufficient, evasive, general and not specific.

6. Defendant admissions to Admission No.6 is false and misleading; the admittance is general and response is insufficient.

7. Defendant Kessler's denial to Admission No.7, is insufficient and not sufficiently specific. This request is relevant. Defendant true response to this requested admission, is very relevant to the substance of this case.

8. Defendant Kessler's denial to Admission No.8, is not sufficiently specific. The request is relevant.

9. Defendant Kessler's response to Admission No.11, is improper, statements is general, evasive; the response is not sufficiently specific and misleading; statement is general without any specific and insufficient. The Defendant failed to answer the requested Admission.

10. Defendant Kessler's to Admission No.12, is not a answer to the requested admission; the requested Admission, is relevant. Defendant response is insufficient and misleading.

11. Defendant Kessler's response to Admission No.13 is improper, response is not sufficiently specific. The requested admission is relevant to the substance of this case.

12. Defendant Kessler's admittance to Admission No. 15, is improper,

evasive, false and misleading. The requested admission is relevant to the substance of this civil case.

13. Defendant's denial to Admission No.17, is not specific; as to the substance of the requested Admission. The denial is not sufficiently specific.

14. Defendant Kessler's denial to Admission No.18, is not sufficient specific; the request is relevant. Defendant denial is without specific and his statement is general.

15. Defendant Kessler's denial to Admission No.19, is not sufficiently specific and very relevant to this civil matter or admission; his response is incomplete. The requested Admission is relevant to this case.

16. Defendant Kessler's denial of Admission No.20, is without specification and doesn't addresses the substance of the requested Admission, the requested admission is very relevant.

Plaintiff request that Defendant Kessler's, response to this letter, with the appropriate response, within 30 days. Response should be in verification form and signed by the Defendant.

Respectfully,
Tyrone James

Tyrone P. James,
#1 1461

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

TYRONE P. JAMES :
Plaintiff, :
v. : CIVIL ACTION NO. 1:01-CV-1015
YORK COUNTY POLICE DEPARTMENT, : (Judge Kane)
JAMES A. MORGAN, RICHARD PEDICORO, : (Magistrate Judge Mannion)
RAYMOND E. URUAL, GENE WILLS, : JURY TRIAL DEMANDED
DET. KREISLER, O.D. SAYLARK, :
RANDY SIEPER, COUN. WISCONSIN, :
and LESTERIVE GLONCOWSKI :
Defendants. :
:

PROOF OF SERVICE

I, Tyrone P. James, Plaintiff's, obo se, hereby certify that, I am this day serving a true and correct copy to assigned counsel's, "Letter to Undesignated Counsel Addressing Defendants Gloncowski, Kressler and Rehlicard Response to Plaintiff's Request for Admission" Please Note, Defendants Pedicoro, as failed to respond to Plaintiff's Request for Admission as of this date." in the manner set forth below to the following, by placing said legal mailed envelope, deposited into the institutional mail box, and turning over said documents to prison officials for mailing:

of FIRST CLASS U.S. MAIL:

Jason C. Quirinano
Attorney General's Office
Commonwealth Of Pennsylvania
15th Floor, Strawberry Square
Harrisburg, PA 17120

Donald G. Rehlicard, Esq.,
Law Office Of Donald G. Rehlicard
1011 Eastern Blvd., Suite 204

Carole J. McGraw
110 W.A. Street, Suite 1100
San Diego, CA 92101

I, certify under penalty of perjury, that the foregoing, are true and correct pursuant to 28 U.S.C. § 1746.

Date: May

Tyrone P. James
EX 9451
P.O. Box A
Bellefonte, PA 16823-0820

Eycone P. James
EX 9451
P.O. Box A
Bellefonte, PA 16823-0620

May 12, 2004

Jason Quirintano
Office of Attorney General
Commonwealth of Pennsylvania
15th Floor, Strawberry Square
Harrisburg, PA 17120

RE: James v. York County, Police Dept., et al, 01:01-cv-1016

Dear Jason C. Quirintano:

Defendant Morgan's response to Plaintiff's Request for Admission.

1. Defendant Morgan denial in part to Request For Admission NO. 2, is not sufficiently specific, addressing the substance of the requested Admission.
2. Defendant Morgan denial as to Admission NO.6. [given that there are two numbers 6, we will address the first as 6(1) and the second as 6(2)]; his denial as to 6(1) is not sufficiently specific, the request is very relevant to the substance of this case.
3. Defendant Morgan's Objection to admission NO. 6(2), is improper; his response is insufficient and failed to address the requested Admission, and his answer is incomplete.
4. Defendant Morgan denial to Admission NO.7, is not sufficiently specific. the request is very relevant to the case.
5. Defendant Morgan's denial to Admission NO.8, is not sufficiently specific, false and misleading; it doesn't address the substance of the requested Admission.
6. Defendant Morgan denial of Admission NO.9, is not sufficiently specific and lack or failed to address the substance of the requested Admission. this request is very relevant to this civil matter.
7. Defendant Morgan's denial of Admission NO.10, is not sufficiently specific; the request is very relevant to the substance of this case.
8. Defendant Morgan denial of Admission NO.11, is not sufficiently specific. The substance of the requested Admission is very relevant to this civil matter.
9. Defendant Morgan's denial of Admission NO.12, is without sufficient specific; the substance of the requested Admission is very relevant. District Attorney William Graff, is not a party to this complaint or this Admission; defendant answer is Noarsay. Mr. Graff, would need to authenticate his request to hold plaintiff's.
10. Defendant Morgan's denial of Admission NO. 13, is not sufficiently specific, the substance of the requested Admission is very relevant. Defendant response is false and misleading.
11. Defendant Morgan's denial of Admission NO.14, is not sufficiently

specific. The substance of the requested Admission is very relevant to this case.

12. Defendant Morgan's partial denial to Admission NO.13, is not sufficiently specific; the response is false and misleading, and evasive. There was no warrant obtained for Mail Box #6c, 2536 Eastern Blvd., York, PA 17402, neither was there any arrest warrant to arrest Plaintiff's. Defendant refused to admit. The requested Admission is relevant to the substance of this case.

13. Defendant Morgan's partial denial to admission NO.14, is not sufficiently specific; his response is false and misleading. Defendant, refusal to admit, show a sense of admission to the requested Admission. Defendant response is incomplete. The requested Admission is relevant this civil case. There are prior sworn statements, in which defendant admitted under oath, which he stated that he denied Plaintiff's access to the phone, to call his attorney, because he fear, that, he would mess up his investigation.

14. Defendant Morgan's Objection to Admission NO. 20 is improper; the response is insufficient and not reasonable ground for objection.

15. Defendant Morgan's objection to admission NO.21, is not sufficiently specific. The requested Admission is relevant to the substance of the requested Admission. Defendant response are false and misleading.

16. Defendant Morgan's denial to Admission NO. 22, is not sufficiently specific; the requested Admission is very relevant to the substance to this case.

17. Defendant Morgan's objection to Admission NO.23 is improper; statement is general and insufficient. The substance of the requested admission is relevant to this case.

18. Please Note: [Plaintiff's submitted two requested Admission NO. 24, we will address it has 24(1) and 24(2)]. Defendant Morgan's denial of Admission NO. 24(1) is not sufficiently specific; the requested Admission is very relevant to the substance of this case.

19. Defendant Morgan's objection to Admission NO.24(2), is improper and insufficient. The substance of the requested Admission is relevant to this case.

20. Defendant Morgan denial to Admission NO. 25, is not sufficiently specific. The requested Admission is very relevant to the substance to this civil case.

Plaintiff's request that Defendant Morgan response to this letter with the appropriate response within 30 days. Response should be in verify form, signed by the Defendants

Respectfully,

Date: May 12, 2004

Tycore P. James,
EX 9451.

Tyrone P. James
EX 9451
P.O. Box A
Beliefonte, PA 16823-0820

May 12, 2004

Jason C. Guirintano
Office of Attorney General
Commonwealth Of Pennsylvania
15th Floor, Strawberry Square
Harrisburg, PA 17120

RE: James v. York County Police Dept., et al., 01:01-CV-1015

Dear Jason C. Guirintano:

Defendant Westmoreland's response to plaintiff's request for Admission.

1. Defendant Westmoreland response to Admission No.1, is improper; Defendant refusal to admit to the requested Admission. The request is relevant to this civil matter. His statement is general.
2. Defendant Westmoreland denial to Admission No.2, is improper and the response is insufficient.
3. Defendant Westmoreland denial to Admission No.3, is not sufficiently specific. It failed to address the substance of the requested Admission.
4. Defendant Westmoreland denial to Admission No.4, is insufficient as to the substance of this case, and not specific.
5. Defendant Westmoreland's objection to Admission No.5 is improper, the request is relevant to this civil matter.
6. Defendant Westmoreland objection to Admission No.7 is improper; the statement is general and response is insufficient.
7. Defendant Westmoreland response to Admission No.8, is a refusal to admit. this should be treated as a admittance. Defendant true response to this requested admission, is very relevant to the substance of this case.
8. Defendant Westmoreland's Objection to Admission No.14, is improper. The request is relevant.
9. Defendant Westmoreland objection to Admission No.15, is improper; the response is false and misleading; statement is general without any specific and insufficient. The Defendant failed to answer the requested Admission.
10. Defendant Westmoreland Objection to Admission No.16, is improper; the requested Admission, is relevant. Defendant response is insufficient.
11. Defendant Westmoreland objection to Admission No.17 is improper. The request is ground for admission and is relevant to the substance of this case.
12. Defendant Westmoreland objection to Admission No. 18, is improper,

the request is relevant to the substance of this civil case.

13. Defendant Westmoreland denial to Admission NO.19, is not specific; as to the substance of the requested Admission. The denial is not sufficiently specific.

14. Defendant Westmoreland objection to Admission NO.20, is improper; the request is relevant. Defendant objection is without specific and his statement is general.

15. Defendant Westmoreland response to Admission NO.22, is misleading and would lead to his refusal to admit or answer; his response is incomplete. The requested Admission is relevant to this case.

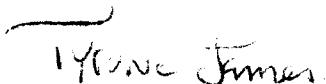
16. Defendant Westmoreland denial of Admission NO.23, is without specification and doesn't addresses the substance of the requested Admission.

17. Defendant Westmoreland objection to NO. 24, is improper; the response is insufficient and the requested Admission is very relevant to the substance of the case.

18. Defendant Westmoreland objection to NO.25 is improper to the response. It is very relevant and not incoherent, as it addresses the substance of the requested Admission.

Plaintiff request that Defendant Westmoreland, response to this letter, with the appropriate response, within 30 days. Response should be in verification form and signed by the Defendant.

Respectfully,


Tyrone James,
EX 9451

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

TYRONE P. JAMES

Plaintiff,

v.

YORK COUNTY POLICE DEPARTMENT,
JAMES H. GORMAN, RICHARD PREDICORO,
RANIERO A. CRONO, CASE PEPPER,
DET. KIRSELER, CO. PAYLACK,
RANDY LIPPS, DRAKE MCNAULAND,
and DETECTIVE GLONZESKI
Defendants.

CIVIL ACTION NO. 1:01-CV-1015
(Judge Kane)
(Magistrate Judge Hannan)

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I, Tyrone P. James, Plaintiff's, pro se, hereby certify that, I am this day serving a true and correct copy to Plaintiff's counsel's, "Letter addressed to undersigned counsel Jason C. Guirintano, relating to Defendants Koman's and Westmoreland response to Plaintiff's request for admission," to the manner set forth below to the following, by placing said legal manila envelope, deposited into the institutional mail box, and turning over said documents to prison officials for mailing:

BY FIRST CLASS U.S. MAIL:

Jason C. Guirintano
Attorney General Office
Commonwealth of Pennsylvania
15th Floor, Strawberry Square
Harrisburg, PA 17120

Donald L. Rehart, Esq.,
Law Office Of Donald L. Rehart
3015 Eastern Blvd., Suite 204
York, PA 17102

I, Tyrone P. James, verified that the foregoing is true and correct, pursuant to U.S.C. 28 j 1746.

Date: May 12, 2004

Tyrone P. James
EX 9451
P.O. Box A
Bellefonte, PA 16823-0023.

Tyrone P. James
EX 9451
P.O. Box A
Bellefonte, PA 16823-0820

May 28, 2004

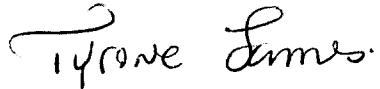
Jason C. Guirintano
Attorney General Office
Commonwealth Of Pennsylvania
15th Floor, Strawberry Square
Harrisburg, PA 17120

RE: James v. York County Police Dept., et al.,

Dear Attorney Guirintano,

Plaintiff's Request For Admission to Defendant Peddicord, has not being answered. The Defendant Peddicord, has failed to response in a timely manner; 30 days after Defendants has been served. There Plaintiff's, deem that Defendant has admitted, to all Plaintiff's Request For Admission. Also, Defendants have failed to response to Plaintiff's Second Request For Interrogatories, which the Defendants refused to respond. The Magistrate Judge Ordered interrogatories on May 4, 2004.

Respectfully,



Tyrone P. James
EX 9451.

Tyrone P. James
EX 9451
P.O. Box A
Bellefonte, PA 16823-0820

May 28, 2004

Jason C. Guirintano
Attorney General Office
Commonwealth Of Pennsylvania
15th Floor, Strawberry Square
Harrisburg, PA 17120

RE: James v. York County Police Dept., et al.,

Dear Attorney Guirintano,

Defendant Anthony (Tony) Glowczeski, response to "Plaintiff's Request For Admission."

1. Defendant Glowczeski Objection to Admission NO. 2 is not sufficiently specific and is improper. The requested admission is relevant.
2. Defendant Glowczeski denial to Admission NO. 3, is not sufficiently specific, and doesn't addresses the substance of the requested admission.
3. Defendant Glowczeski denial to Admission NO.4 is not sufficiently specific; the requested admission is relevant.
4. Defendant Glowczeski objection to Admission NO.5 is improper and not sufficiently specific. The requested admission is relevant.
5. Defendant Glowczeski objection to Admission NO. 10 is improper and not sufficiently specific; this request is ground for admission, because it addresses the substance of the requested admission.
6. Defendant Glowczeski, response to Admission NO.11, is not sufficiently specific; the response is a refusal to Admit; I don't recall, is not sufficient.
7. Defendant Glowczeski, denial to Admission NO.12, is not sufficiently specific. The request is relevant.
8. Defendant Glowczeski, denial to Admission NO.13, is not sufficiently specific and does not specifically address the substance of the requested Admission. The request is relevant.
9. Defendant Glowczeski, denial of Admission NO.15, is not sufficiently specific. The request is relevant.
10. Defendant Glowczeski response to Admission NO.16, is incomplete and evasive. The requested information is relevant to this civil matter.
11. Defendant Glowczeski response to Admission NO.17 is incomplete. Defendant response is relevant, because defendant touch on this issue in his answer to plaintiff's request for interrogatories.

12. Defendant Glowczeski denial to Admission N0.18, is without specific; the denial does not specifically address the substance of the requested admission. The requested admission is relevant.

13. Defendant Glowczeski, objection to Admission N0.19, is improper and not sufficiently specific; the requested is admission is relevant.

14. Defendant denial to Admission N0.20, is not sufficiently specific; the requested Admission is very relevant to the case in hand.

15. Defendant Glowczeski, objection to Admission N0.22, is improper; the requested Admission is very relevant to the substance of this case.

16. Defendant denial to Admission N0.23, is no sufficiently specific. The requested Admission is very relevant to the substance of this case.

Plaintiff's request that Defendant Glowczeski, response to this letter with the appropriate responses within 30 days. Response should be in verified form, signed by the Defendant.

Respectfully,

Tyrone James

Tyrone P. James
EX 9451.

Tyrone P. James
BX 9451
P.O. Box A
Belefonte, PA 16823-0350

May 29, 2004

Jason C. Guirinano
Office of Attorney General
Commonwealth of Pennsylvania
15th Floor, Strawberry Square
Harrisburg, PA 17120

Re: James v. York County Police Dept., et al., 11:11-cv-1012

Dear Jason C. Guirinano:

Defendant Kessler's response to plaintiff's request for Admissions.

1. Defendant Kessler's response to Admission #1, is improper; Defendant refused to admit to the request of Admission. The request is relevant to this civil matter. His statement is general and not sufficient.
2. Defendant Kessler's response to Admission #2, is improper and response is insufficient. It is an incomplete response.
3. Defendant Kessler's response to Admission #3, is not sufficient, specific. It failed to address the substance of the requested Admission.
4. Defendant Kessler's to Admission #4, is insufficient as to the substance of this case, and not specific.
5. Defendant Kessler's response to Admission #5 is improper, the request is relevant to this civil matter; the response is insufficient, generic, general and not specific.
6. Defendant admissions to Admission #6, is false and misleading; the admissions is general and response is insufficient.
7. Defendant Kessler's denial to Admission #7, is insufficient and not sufficiently specific. This request is relevant. Defendant true response to this requested admission, is very relevant to the substance of this case.
8. Defendant Kessler's denial to Admission #8, is not sufficiently specific. The request is relevant.
9. Defendant Kessler's response to Admission #9, is improper, statements is general, evasive; the response is not sufficiently specific and misleading; statement is general without any specific and insufficient. The Defendant failed to answer the requested Admission.
10. Defendant Kessler's to Admission #10, is not a answer to the requested admission; the requested Admission, is relevant. Defendant response is insufficient and misleading.
11. Defendant Kessler's response to Admission #11 is improper, response is not sufficiently specific. The requested admission is relevant to the substance of this case.
12. Defendant Kessler's admission to Admission #12, is improper,

evasive, false and misleading. The requested admission is relevant to the substance of this civil case.

13. Defendant's denial to Admission NO.17, is not specific; as to the substance of the requested Admissions. The denial is not sufficiently specific.

14. Defendant Kessler's denial to Admission NO.18, is not sufficient specific; the response is relevant. Defendant denial is without specific and his statement is general.

15. Defendant Kessler's denial to admission NO.19, is not sufficiently specific and very relevant to this civil matter or admissions; his response is incomplete. The plaintiff's request is relevant to this case.

16. Defendant Kessler's denial of Admission NO.20, is without specification and doesn't address the substance of the requested Admissions, the requested admission is very relevant.

Plaintiff request that defendant Kessler's, response to this letter, with the appropriate responses, will be made. Response should be in verification form and signed by the defendant.

Respectfully,

Tyron P. Jones,
PL 9401

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

TYRONE P. JAMES

Plaintiff,

v.

PAGE COUNTY POLICE DEPARTMENT,
JAMES A. MCGOWAN, RICHARD PETROCKO,
RAYMOND S. CRUZ, GENE FOLLES,
Sgt. KOSICKI, Mr. MILLER,
MARK REPPAS, SCOTT HOMMELAND,
and DETECTIVE G. MURKINSKI
Defendants,

:
:
:
: CIVIL ACTION NO. 1:01-CV-1015
: (Judge Cole)
: (Magistrate Judge Mannion)
:
:
: JURY TRIAL DEMANDED
:
:
:

CERTIFICATE OF SERVICE

I, Tyrone P. James, Plaintiff's pro se, hereby certify that, on this day serving a true and correct copy to assigned counsel's, "Letter to Undesignated Counsel Addressing Defendants Gloucester Kissler and Peifferord Response to Plaintiff's Request for Admission; Please Note, Defendants Peifferord, as failed to respond to Plaintiff's Request for Admission as of this Date," in the manner set forth below to the following, by placing same legal manila envelope, deposited into the institutional mail box, and handing over said documents to prison officials for mailing:

BY FIRST CLASS U.S. MAIL:

Jason C. Giurintano
Attorney General's Office
Commonwealth Of Pennsylvania
15th Floor, Strawberry Square
Harrisburg, PA 17120

Donald L. Rehbar, Esq.
Law Office Of Donald L. Rehbar
1111 Chestnut St., Suite 204

Carole J. McGraw
110 W.A. Street, Suite 1100
San Diego, CA 92101

I, certify under penalty of perjury, that the foregoing are true and correct pursuant to 28 U.S.C. § 1746.

Date: May

Tyrone P. James
6X 9451
P.O. Box 1
Bellfonte, PA 16823-0001

Tyrone P. James
EX 9451
P.O. Box A
Bellefonte, PA 16823-0820

June 21, 2004

Jason C. Giurintano
Attorney General Office
Commonwealth Of Pennsylvania
15th Floor, Strawberry Square
Harrisburg, PA 17120

RE: James v. York County Police Dept., Civil NO. 1:01-CV-1015

Dear Mr. Giurintano

Plaintiff's received Defendants responses of "Plaintiff's Second Request For Interrogatories," ordered by the Court on May 4, 2004; and that Defendants should respond in accordance with Rule 33, Federal Rule Civil Procedure.

Please note, defendants responses are untimely. Defendants made several objections in their response; defendants objections to request number 1 and 8 are improper, and not sufficiently specific. Plaintiff's requests sought, are highly relevant, as it relates to information pertaining to a particular kinds of complaints and allegations, as to any grievances, complaints, or prior use of force, and does not relates to personnel records, such as medical data, or information about their records of lateness, leaves and vacations, etc.

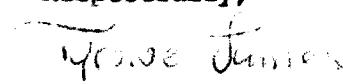
Defendants objections to request 10,11,12 and 13 are improper and not sufficiently specific. Furthermore, Defendants objections are waived as they failed to comply with Rule 33, Fed.R.Civ.P.; by failing to response in a timely manner.

Plaintiff's respectfully pray that Defendants respond to "Plaintiff's Second Request For Interrogatories," by answering the request appropriately and responding with Fourteenth (14) days, upon receipt of this letter, base on court order.

Please Note, Defendants counsel filed an "Defendants' Memorandum Of Law In Opposition To Plaintiff's Motion To Compel Discovery," on June 14, 2004; counsel should note that you send pleading to the wrong address, counsel was aware that Plaintiff's was at SCI-Rockview, not the York County Prison, where counsel send pleadings. Plaintiff's received Pleading on June 24, 2004, ten (10) after.

days

Respectfully,



Tyrone P. James
EX 9451

cc: Donald L. Reihart, Esq.
Tyrone P. James, (Plaintiff).

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

TYRONE P. JAMES	:	
Plaintiff,	:	
v.	:	CIVIL ACTION NO. 1:01-CV-1015
	:	(Judge Kane)
	:	(Magistrate Judge Marion)
YORK COUNTY POLICE DEPARTMENT,	:	JURY TRIAL DEMANDED
JAMES A. MORGAN, RICHARD MEDICORD,	:	
RAYMOND E. CRUZ, GENE FELLS,	:	
DET. KESSLER, CO. PAYLARK,	:	
RANDY SIPES, BRIAN WESTMORELAND,	:	
and DETECTIVE GLOWCZEWSKI	:	
Defendants,	:	

CERTIFICATE OF SERVICE

I, Tyrone P. James, Plaintiff v., and sua legeby certified hand, I on this day serving, a true and correct copy to Plaintiff's counsele, "Plaintiff's Letter in response to Defendants' response to, "Plaintiff's Second Request for Interrogatories, and Defendants' Memorandum of Law in opposition to Plaintiff Motion Re Counsel Discovery," in the manner set forth below by the following, by placing said legal manila envelope, deposited onto the institutional mail box, and turning over said documents to prison officials for mailing:

BY FIRST CLASS U.S. MAIL:

Jason C. Reinhardt
Attorney General Office
Commonwealth Of Pennsylvania
15th Floor, Strawberry Square
Harrisburg, PA 17120

Donald L. Reinhart, Esq.
Law Office Of Donald L. Reinhart
515 Western Blvd., Suite 204
York, PA 17402

Carole J. Rogue
110 W.A. Street, Suite 1100
San Diego, CA 92101

I, certify under penalty of perjury, that the foregoing motions are true and correct, to the best of my knowledge and belief, pursuant to 28 U.S.C. § 1746.

Date: June 24, 2004

Tyrone P. James
AX 9451
P.O. Box 4
Bellfonte, PA 16823-0820.

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

TYRONE P. JAMES,

Plaintiff :	
	No. 1:CV-01-1015
v.	
	(Judge Kane)
	(Magistrate Judge Mannion)
YORK COUNTY POLICE DEPARTMENT; AGENT JAMES H. MORGAN; DET. RICHARD PEDDICORD; DET. RAYMOND E. CRAUL; SGT. GENE FELLS; DET. ANTHONY GLOWCZEWSKI; AGENT RANDY SIPES; and AGENT BRIAN WESTMORELAND,	Electronically Filed
Defendants :	

CERTIFICATE OF SERVICE

I, Jason C. Giurintano, Deputy Attorney General for the Commonwealth of Pennsylvania, Office of Attorney General, hereby certify that on June 14, 2004, I caused to be served a true and correct copy of the foregoing document entitled Defendants' Memorandum Of Law In Opposition To Plaintiff's Motion To Compel Discovery by depositing same in the United States Mail, first-class postage prepaid to the following:

Tyrone P. James, #62154
York County Prison
3400 Concord Road
York, PA 17402

Donald L. Reihart
Law Office of Donald L. Reihart
2600 Eastern Blvd., Suite 204
York, PA 17402

s/Jason C. Giurintano
JASON C. GIURINTANO
Deputy Attorney General

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

TYRONE P. JAMES :
Plaintiff, :
v. : CIVIL ACTION NO. 1:01-CV-1015
YORK COUNTY POLICE DEPARTMENT, : (Judge Kane)
JAMES H. MORGAN, RICHARD PEDDICORD, : (Magistrate Judge Mannion)
RAYMOND E. CRUAL, GENE FELLS, : JURY TRIAL DEMANDED
DET. KESSLER, CO. BAYLARK, :
RANDY SIPES, BRIAN WESTMORELAND, :
and DETECTIVE GLOWCZESKI :
Defendants, :

CERTIFICATE OF SERVICE

I, Tyrone P. James, Plaintiff's, pro se, hereby certified that, I am this day serving a true and correct copy to assigned counsel's, "Affidavit In Support Of Motion To Compel; Brief In Support Of Motion To Compel Discovery; Letters and Attachments," in the manner set forth below to the following, by placing said legal manila envelope, deposited into the institutional mail box, and turning over said documents to prison officials for mailing:

BY FIRST CLASS U.S. MAIL:

Jason C. Giurintano
Pennsylvania Attorney General Office
15th Floor, Strawberry, Square
Harrisburg, PA 17120

Donald L. reihart, Esq.
Law Office Of Donald L. Reihart
3015 Eastern Blvd., Suite 204
York, PA 17402

Kristin G. Hogue
State Of California, department Of Justice
Office Of Attorney General
110 West A Street, Suite 1100
P.O. Box 85266
San Diego, CA 92186-5266.

I, Tyrone P. James, certify that the foregoing are true and correct, , pursuant to 28 U.S.C. § 1746.

Date: June 25, 2004

Tyrone James.

Tyrone P. James
EX 9451
P.O. Box A
Bellefonte, PA 16823-0820.